

TECHNICAL MEMORANDUM

OK

Utah Coal Regulatory Program

July 5, 2006

TO: Internal File

THRU: Peter H. Hess, Environmental Scientist/Engineering, Team Lead *PHH by an*

FROM: Priscilla W. Burton, Environmental Scientist/Soils *PWB by an*

RE: Mid-Term Review, Canyon Fuel Company, Dugout Canyon Mine, C/007/039,
Task ID #2528

SUMMARY:

The Division initiated a mid-term review of the Dugout Canyon Mine MRP on October 13, 2005 (see Outgoing file document 0072.pdf). After review of the soils section of the MRP, it is clear that the Permittee must provide as-built volumes for all stockpiles at the Soldier Canyon Topsoil Storage Area. Commitments in the MRP direct the Permittee to provide an as-built and indicate the storage area designated for Area #5 steep slope soils.

Table 2-2 was revised with as-built volumes as requested. This information was received on May 19, 2006.

TECHNICAL ANALYSIS:

OPERATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

Analysis:

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Topsoil Removal and Storage

Refuse Site [05/05/05]

An amendment for the refuse site development is currently under review. In the amendment, Table 2-2 of RA Attachment 2-2 provides the estimated topsoil and subsoil volumes as 22,809 yd³. [This is considerably less than the anticipated salvage volume of 44,317 yd³.] Salvaged topsoil material is further identified in Section 242.100 as follows:

7,298 yd³ topsoil stockpiled with berms included.
15,511 yd³ subsoil stockpiled with berms included.

Pace Canyon [05252005]

Two stockpiles were constructed in Pace Canyon for reclamation of the fan portal (Appendix 2-9 and Plate PC5-2). Both are located on undisturbed ground that is demarcated with marker strips. These stockpiles are estimated to hold 566 and 3,027 cubic yards. They have been constructed with 2h:1v side slopes (Appendix 2-9). Figure 1 in Appendix 2-9 indicates the maximum depth of the south stockpile is 15 – 17 feet. The maximum depth of the north stockpile is 10 feet.

The north stockpile is surrounded with a subsoil berm (Section 234.200). This berm is three feet tall at its lowest point (designs for this berm are on page 37 of Attachment 1 in Appendix 7-12). The south stockpile has berms on either side directing flow to a silt fence. At the lower portion of the pile, this berm is two feet tall (designs in Appendix 7-12 Attachment 1, pp. 36-38).

Topsoil at Pace Canyon is also temporarily stockpiled above the portal and along the channel diversion area for immediate replacement after construction of the portal and channel diversion (Plate PC5-2 and MRP section 242.100.) The temporary stockpile is protected with a silt fence.

The entire disturbed area is being fenced to protect the topsoil stockpiles from grazing and to protect the livestock herd in Pace Canyon (Grazing Allotment No. 24085).

Final as-built volumes for the north and south stockpile will be provided to the Division with the as-built information for the Pace Canyon fan portal facility.

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Dugout/Soldier Canyon Storage Area [12/02/05]

There exist four stockpiles at the Dugout portion of the Soldier Canyon Storage Area (Plate 2-3). The first pile was created during Phase I construction. The second stockpile was created during Phase II construction of the mine site (permit issued on 10/16/98). A third pile contains riparian soils from the Gilson water well development. The fourth pile created during substation construction is part of the soil/rock storage area specified on Plate 2-3. All piles are signed.

The plan includes information on pile construction in Sections 224, 231.100, 231.400 and Plate 2-2 and App. 2-5. Table 2-2 provides an estimate of topsoil salvage by location and an as-built volume for each stockpile. The total volume of all stockpiles was surveyed and found to be 26,247 yd³ of soil (Table 2-2 and Sec. 233.200).

The Area #5 soils described in Section 231.100 of the MRP, were placed at the south end of the north pile (App. 2-6 and Plate 2-3).

Plate 2-5A provides the locations of steep slope soil removal (as per the commitment at the bottom of page 2-29 of the MRP).

Findings:

The information provided meets the regulatory requirements of Topsoil/Subsoil Operation Plans.

RECOMMENDATIONS:

The Division's mid-term review of soils related information is complete.